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Liquidating Trustee of the Jetready

Liquidating Trust

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	:
	:
ALL IN JETS, LLC, d/b/a JET READY,	:
	:
Debtor.	:
-----X	

Chapter 11
Case No. 20-11831 (MEW)

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO THE
TRUSTEE’S MOTION FOR AN ORDER PURSUANT TO FED. R.
BANKR. P. 9019 APPROVING THE AGREEMENT SETTLING AND
RESOLVING ALL CLAIMS AND CONTROVERSIES BY AND BETWEEN
(I) YANN GERON, AS LIQUIDATING TRUSTEE OF THE JETREADY
LIQUIDATING TRUST, ON BEHALF OF HIMSELF AND THE DEBTOR’S
BANKRUPTCY ESTATE; AND (II) EACH OF THE BERNSTEIN PARTIES**

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, the undersigned hereby certifies as follows:

1. On November 17, 2023, Yann Geron (the “Trustee”), the Liquidating Trustee of the JetReady Liquidating Trust (the “Trust”), which was established pursuant to the confirmed fifth amended plan of reorganization of All in Jets, LLC, d/b/a JetReady, the above-captioned reorganized debtor (the “Debtor”), by and through his undersigned special litigation counsel, filed the *Trustee’s Motion for an Order Pursuant to Fed. R. Bankr. P. 9019 Approving the Agreement Settling and Resolving All Claims and Controversies by and Between (I) Yann Geron, as*

Liquidating Trustee of The JetReady Liquidating Trust, On Behalf of Himself and the Debtor's Bankruptcy Estate; and (II) Each of The Bernstein Parties (the "Motion") [Docket No. 188] and Notice of Hearing on Trustee's Motion for an Order Pursuant to Fed. R. Bankr. P. 9019 Approving the Agreement Settling and Resolving All Claims and Controversies by and Between (I) Yann Geron, as Liquidating Trustee of The JetReady Liquidating Trust, On Behalf of Himself and the Debtor's Bankruptcy Estate; and (II) Each of The Bernstein Parties (the "Notice of Hearing") [Docket No. 189].

2. Pursuant to the Notice of Hearing, any objections to the Motion were to be filed no later than December 6, 2023 at 5:00 p.m. (EST) (the "Objection Deadline").

3. The Trustee caused the Notice of Hearing and Motion to be served on November 17, 2023, as reflected in the affidavits of service filed with the Court [Docket Nos. 190 and 191].

4. As of the date hereof, which is more than forty-eight (48) hours after the Objection Deadline, no objection or responsive pleading has been served upon the undersigned. Additionally, the undersigned has reviewed the Court's docket in this case and no objection or responsive pleading has been filed with the Court. Lastly, the undersigned is unaware of any objection, responsive pleading or request for a hearing with respect to the Motion.

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Based on the foregoing, the Trustee respectfully requests the proposed order presented with the Motion be entered without a hearing.

Dated: New York, New York
December 8, 2023

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

By: /s/ Lauren C. Kiss

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